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July 23, 2025

BY ECF

The Honorable Jennifer H. Rearden
Daniel Patrick Moynihan United States Courthouse
500 Pearl St
New York, NY 10007

Application GRANTED. The deadline for Defendants to file pretrial motions is extended to **August 8, 2025**. The Government shall respond by **August 29, 2025**, and Defendants shall file their replies by **September 8, 2025**.

The Clerk of Court is directed to terminate ECF No. 64.

SO ORDERED.

A handwritten signature in blue ink that reads 'Jennifer H. Rearden'.

Jennifer H. Rearden, U.S.D.J.

Dated: July 25, 2025

Re: *United States v. David Macey and Edwin Pagan III*, 24-CR-641-JHR

Dear Judge Rearden:

I represent Edwin Pagan III. Mr. Pagan and Mr. Macey respectfully request a two-week extension of the deadline to file pretrial motions, which was recently extended to July 25, 2025. (Endorsed Letter, ECF 63). Simultaneous to Mr. Macey's attorneys requesting the previous extension, I was separately communicating with the government about an extension because of trial. I was hired by a Manhattan based record label that recently sold to Interscope Geffen A&M to represent one of their artists. Hakeem A. Robinson is charged with first degree murder in Jacksonville, Florida. I am lead counsel, trial started this past Monday, it is extensive, and we are doing very long days in court. Trial is expected to conclude on or after August 8. Making time to file this letter motion was difficult; filing Mr. Pagan's pretrial motions while in trial is impossible. I hoped to file motions for Mr. Pagan before trial but was unexpectedly involved in two lengthy *Daubert* motions and hearings on Mr. Robinson's matter.

With this extension, responses would be due on August 29 and replies on September 8. The parties continue to engage in productive discussions around pretrial motions and related issues. An extension of the deadline would allow the parties to continue those discussions and potentially avoid unnecessary motion practice. The next conference in this case is scheduled for October 28. No deadlines or scheduled dates would be impacted by such an extension.

I conferred with Assistant United States Attorney Emily Deininger. The government agrees with an extension to August 1 but disagrees with August 8.

Thank you for Your Honor's consideration.

Respectfully submitted,

/s/ Christopher M. DeCoste
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Attachments: none